

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

Afraaz R. Irani, M.D.,)
Plaintiff,) C.A. No. 3:14-cv-3577-CMC-KDW
v.)
Palmetto Health; University of South Carolina)
School of Medicine; David E. Koon, Jr., M.D., in)
his individual capacity; and John J. Walsh, IV,)
M.D., in his individual capacity,)
Defendants.)

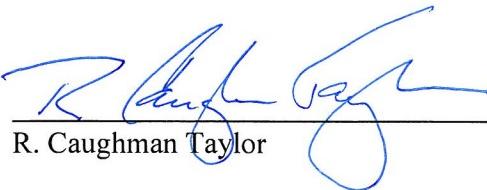
)

**AFFIDAVIT OF
R. CAUGHMAN TAYLOR**

R. Caughman Taylor, whose signature appears below, testifies under oath as follows:

1. I am Interim Dean of the University of South Carolina School of Medicine. I have personal knowledge and am competent to testify as to the matters stated in this affidavit.
2. Dr. Alfraaz Irani is a former resident in the Orthopaedic Surgery Residency Program sponsored by Palmetto Health.
3. I have confirmed Dr. Irani was never employed by the University of South Carolina School of Medicine.
4. I have confirmed Dr. Irani never had a contract with the University of South Carolina School of Medicine.
5. I have confirmed the University of South Carolina School of Medicine does not have a contract with the Accreditation Council for Graduate Medical Education (ACGME) that would benefit Dr. Irani.

I testify under penalty of perjury this 9th day of January, 2015, that the foregoing statements are true and correct.


R. Caughman Taylor